Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of Part 97 of the Rules	)	
Governing the Amateur Radio	)	**RM-8218**
Services Concerning High-Frequency	)	
Data Communications	)	

To: The Commission

COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE, INCORPORATED

The American Radio Relay League, Incorporated (the League), the national non-profit association of amateur radio operators in the United States, by counsel and pursuant to Section 1.405(a) of the Commission's Rules, hereby respectfully submits its comments in continued support of its February 1, 1993 Petition for Rule Making (the petition). The petition sought changes in Part 97 of the Commission's Rules governing the Amateur Radio Services (47 C.F.R. Section 97.1 et seq.) in accordance with an attached Appendix, to

1. The League's petition was the culmination of a great deal of study and analysis, over a period of some seven years, beginning in 1986. The League has sponsored an extensive program of experimentation involving automatically controlled HF message networks, as per the special temporary authority granted by the Commission. The League has tasked committees of volunteers who are expert in various aspects of digital communications with studying and making recommendations relating to this topic. It has surveyed the concerns and interests of its members with respect to the issues involved in automatic controlled data stations in the HF bands when it appeared that different regulatory approaches each had support; and its Board of Directors and staff have researched the subject repeatedly and extensively.

2. The results of these efforts have led the League to conclude that, as an initial step, the rule changes contained in its petition are necessary to permit the development, and a full exploration of the capabilities, of a rapid national and international message forwarding data network. The proposal for the specification of subbands for this purpose, to control, or at least limit, interference from automatically controlled stations to other types of amateur HF communications on the same or adjacent frequencies, remains a necessary element in this first step. It cannot be seriously disputed by anyone but that the unregulated addition of automatically controlled stations throughout the HF bands would result in harmful interference to other amateur stations, and the disruption of domestic and international amateur

communications. During peak activity periods the amateur HF bands are crowed with stations, who coexist through mutual respect of one another's equal right to operate, toleration of a certain amount of unintentional interference, and flexibility in operating so as to avoid as much such interference as possible. To introduce potentially large numbers of automatically controlled stations into these bands, without restriction, would upset this delicate balance. A cautious approach to introducing automatic control in the HF bands is clearly indicated.

3. Several amateurs have filed comments on the League's petition to date, and have written to League Headquarters since the filing of the petition. They have no apparent opposition to the petition as far as it goes, but have suggested that the petition is an insufficient accommodation for automatic message forwarding systems in the HF bands. They assert that, in terms of where automatically controlled stations may operate, the petition should have gone further. They contend that the creation of subbands for automatically controlled data operation within the HF bands is not sufficient alone to accommodate the full range and capabilities of amateur data networks. As an additional step, beyond the provisions contained in the League's petition, they suggest that, in all parts of the HF amateur allocations in which data communications are permitted, (outside the subbands for automatic control proposed by the League), the rules should allow automatically controlled data stations to operate, provided that they are configured to transmit only when interrogated by stations

operated under local or remote control. By this means, they suggest, interference would be prevented by virtue of the participation of a live operator at one end of the communications. The benefits of such an additional accommodation, they assert, include the development of new, spectrum efficient technologies, such as Pactor and Clover.

4. It may be that this additional authorization has merit. Indeed, upon adopting the policy incorporated in the instant petition, the League contemporaneously requested that its committee on digital communications study that additional proposal. The committee has done so, and has in just the past few days prepared a report for submission to the League's Board of Directors. The Board will review it in July.

5. At the present time, however, it is apparent that the issue of whether automatically controlled stations operating in general in the HF bands, limited to transmission in response to locally or remotely controlled communications from other stations, is a separate and distinct matter from the creation of subbands for fully automatic message forwarding systems in the HF bands. The regulatory considerations, including broad enforcement and interference resolution issues, are separate and distinct from those raised in the instant petition. It is therefore urged that the subject of so-called "semi-automatic control" in portions of the HF bands outside the subbands urged by the League in the instant proceeding be addressed later.

Therefore, the foregoing considered, the American Radio Relay League, Incorporated continues to support its Petition for Rule Making, and urges that the Commission issue a Notice of Proposed Rule Making at an early date, proposing to amend the Amateur Radio Service Rules as set forth in the Appendix to the League's petition, to permit automatically controlled data operation in the high-frequency band segments set forth in the petition.

Respectfully submitted,

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By